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BRYAN J. FREEDMAN

August 11, 2025

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL**

Dear Judge Liman:

On behalf of Defendants Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal sections of the Opposition to Lively’s Omnibus Motion to Compel and Exhibits 2 through 3 to the Wayfarer Parties’ Opposition, filed contemporaneously herewith. Exhibits 2 through 3 are Lively’s discovery requests and responses, which she designated as “Confidential.” The redacted portions of the brief similarly refer to discovery requests and/or responses that Lively designated as “Confidential.” In accordance with Rule 4.b of Attachment A, the Wayfarer Parties respectfully request that the Court not rule on this letter-motion to seal for one week, so that the parties have the opportunity to meet and confer, and so that Lively may file a motion for continued sealing if she so chooses.

Respectfully submitted,

/s/ Theresa M Troupson

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